

EXHIBIT “A”

PROPOSED ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

NOBILIS HEALTH CORP., *et al.*,

Debtors.

Chapter 7

**Case No. 19-12264 (CTG)
(Jointly Administered)**

**ALFRED T. GIULIANO, in his capacity as
Chapter 7 Trustee for the jointly
administered bankruptcy estates of Nobilis
Health Corp., *et al.*,**

Adv. No. 21-51183 (CTG)

Plaintiff,

JURY TRIAL DEMANDED

v.

**HARRY J. FLEMING; P. DAVID
YOUNG; BRANDON MORENO;
KENNETH EFIRD; JAMES
SPRINGFIELD; DONALD KRAMER;
STEVE OZONIAN; TOM FOSTER;
PETER HORAN; SAMUEL PALERMO;
AND MARCOS RODRIGUEZ**

Defendants.

SCHEDULING ORDER

Upon consideration of the Certification of Counsel Regarding Scheduling Order, it is hereby ORDERED that:

1. Defendants shall provide their initial disclosures under Fed. R. Civ. P. 26 (a)(1) no later than ten (10) days after entry of this Order.
2. All fact discovery in this matter shall be initiated so that it will be completed on or before April 28, 2023.

3. For the party who has the initial burden of proof on the subject matter, the initial Federal Rule 26(a)(2) disclosure of expert testimony is due on or before June 2, 2023. The supplemental disclosure to contradict or rebut evidence on the same matter identified by another party is due on or before July 7, 2023. Reply expert reports from the party with the initial burden of proof are due on or before August 11, 2023. No other expert reports will be permitted without either the consent of all parties or leave of the Court. Along with the submissions of the expert reports, the parties shall advise of the dates and times of their experts' availability for deposition. All expert depositions shall be completed on or before September 8, 2023.

4. All case dispositive motions, an opening brief, and affidavits, if any, in support of the motion shall be served and filed on or before October 6, 2023. Answering briefs and accompanying affidavits shall be served and filed on or before November 10, 2023. Reply briefs and accompanying affidavits shall be served and filed on or before December 8, 2023.

5. The parties shall comply with the General Order Governing Pre-Trial Procedures in Adversary Proceedings Set for Trial before Judge Craig T. Goldblatt. The parties shall file, no later than two (2) business days prior to the earlier of date set for (i) pre-trial conference (if one is scheduled) or (ii) trial, their Final Pretrial Order approved by all counsel and shall contemporaneously deliver two (2) copies thereof to Judge Goldblatt's chambers.

6. Deadlines contained in this Scheduling Order may be extended only by the Court and only upon written motion for good cause shown.